

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

FILED
2016 APR 19 PM 4:15

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UNITED STATES OF AMERICA

V.

AMECHI COLVIS AMUEGBUNAM (1)

NO. 3:15-CR-411-K

(Supersedes Indictment returned on
September 23, 2015)

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

Conspiracy to Commit Wire Fraud
(18 U.S.C. § 1349 (18 U.S.C. § 1343))

From in or about November 2013, through in or about August 2015, in the Dallas Division of the Northern District of Texas and elsewhere, defendant Amechi Colvis Amuegbunam, in and affecting a financial institution, namely Wells Fargo and JP Morgan Chase, did knowingly and willfully combine, conspire, confederate, and agree with other individuals known and unknown to the Grand Jury, to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds in violation of 18 U.S.C. § 1343, in that Amuegbunam and other individuals known and unknown to the Grand Jury sent and caused to be sent fraudulent e-mails to

companies in the Northern District of Texas and elsewhere, said e-mails constituting and containing material misrepresentations that caused the companies to wire transfer funds as instructed on a pdf document attached to the e-mail.

In violation of 18 U.S.C. § 1349 (18 U.S.C. § 1343).

COUNTS TWO THROUGH FOUR

Aiding and Abetting

Wire Fraud

(18 U.S.C. §§ 2 and 1343)

On or about the following dates, in the Dallas Division of the Northern District of Texas and elsewhere, defendant Amechi Colvis Amuegbunam, in and affecting the below named financial institutions, did knowingly aid and abet other individuals known and unknown to the Grand Jury to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds in violation of 18 U.S.C. § 1343, in that Amuegbunam and said other individuals sent and caused to be sent fraudulent e-mails to the following companies in the Northern District of Texas, said e-mails constituting and containing material misrepresentations that caused the companies to wire transfer funds or attempt to do so as instructed on a pdf document attached to the e-mail, and said funds were transferred or intended to be transferred from the Company's

bank account to a bank account elsewhere as indicated below:

Count	Date	Company	Company's Financial Institution Account	Receiving Financial Institution Account	Funds Transferred Or To Be Transferred
2	11/06/2013	A ¹	JP Morgan Chase Bank #4297 ²	Natwest Bank London, UK #1339	\$98,550
3	05/16/14	B	Wells Fargo #2121	Hang Seng Bank Hong Kong #883	\$371,455.12
4	05/19/14	B	Wells Fargo #2121	HSBC Hong Kong #838	\$274,309.12

All in violation of 18 U.S.C. §§ 2 and 1343.

A TRUE BILL:


FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



CANDINA S. HEATH
Assistant United States Attorney
Northern District of Texas
State of Texas Bar No. 09347450
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fax: 214.659.8805
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¹ The two Northern District of Texas victim companies known to the Grand Jury are identified as Company A and Company B.

² All but the last three or four digits of the Financial Institution's accounts have been redacted.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

AMECHI COLVIS AMUEGBUNAM (01)

SUPERSEDING INDICTMENT

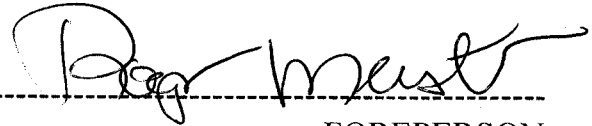
18 USC § 1349 (18 USC § 1343)
Conspiracy to Commit Wire Fraud

18 USC §§ 2 and 1343
Aiding and Abetting Wire Fraud

4 Counts

A true bill rendered

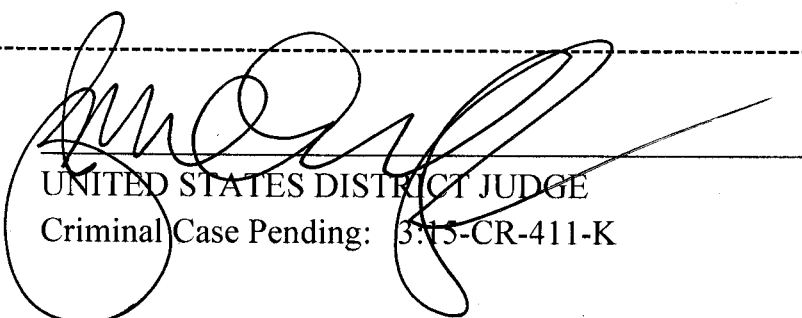
DALLAS



FOREPERSON

Filed in open court this 19th day of April, 2016.

**Defendant in Federal Custody since
August 25, 2015**



UNITED STATES DISTRICT JUDGE
Criminal Case Pending: 3:15-CR-411-K